

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HELEEN MEES,

Plaintiff,

-against-

CITY OF NEW YORK, MANHATTAN  
DISTRICT ATTORNEY'S OFFICE, CYRUS  
VANCE, JR., NITIN SAVUR, JEANINE  
LAUNAY, SAMANTHA SCHOTT,

Defendants.

DECLARATION IN  
SUPPORT OF JOINT  
MOTION TO DISMISS

19 Civ. 7346 (AJN)(KNF)

ELIZABETH N. KRASNOW, an attorney duly admitted to practice in the State of New York, declares under penalty of perjury and pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am an Assistant District Attorney in the New York County District Attorney's Office. I represent the Office; the District Attorney Cyrus R. Vance, Jr.; and Assistant District Attorneys Nitin Savur, Jeanine Launay, and Samantha Schott in the above-captioned civil lawsuit brought by plaintiff *pro se* Heleen Mees.

2. I respectfully submit the exhibits below in support of the joint motion to dismiss filed by the DA defendants and co-defendant City of New York, which is represented by the Office of the Corporation Counsel:

Ex. 1	Criminal Court complaint, filed in New York County Criminal Court in the case of <i>People v. Mees</i> on July 2, 2013
Ex. 2	Superseding information, filed in New York County Criminal Court in the case of <i>People v. Mees</i> on August 7, 2013

Ex. 3	Omnibus motion for discovery and to dismiss in the interests of justice, filed in New York County Criminal Court in the case of <i>People v. Mees</i> on October 10, 2013
Ex. 4	Transcript of the proceedings in New York County Criminal Court in the case of <i>People v. Mees</i> before Judge Steven Statsinger on March 10, 2014
Ex. 5	Petition for a writ of <i>error corum nobis</i> , filed in New York County Criminal Court in the case of <i>People v. Mees</i> on March 8, 2018 (with exhibits)
Ex. 6	Decision of Judge Steven Statsinger, filed in New York County Criminal Court in the case of <i>People v. Mees</i> on July 2, 2018
Ex. 7	Motion for relief under Criminal Procedure Law §440.10, filed in New York County Criminal Court in the case of <i>People v. Mees</i> on or about July 18, 2018 (without exhibits)
Ex. 8	Decision of Judge Steven Statsinger, filed in New York County Criminal Court in the case of <i>People v. Mees</i> on October 30, 2018
Ex. 9	Petition for a writ of <i>error corum nobis</i> , filed in New York County Criminal Court in the case of <i>People v. Mees</i> on December 3, 2018 (with exhibits)

Dated: November 14, 2019  
New York, New York

Elizabeth N. Krasnow /s/  
Elizabeth N. Krasnow  
Assistant District Attorney